

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

C.D.A., minor child, and Mr. A., his father;  
and E.A.Q.A., minor child, and Mr. Q., his  
father,

*Plaintiffs,*

v.

United States of America,

*Defendant.*

Civil Action No. 21-469

**JOINT STIPULATION AND PROPOSED ORDER  
TO HOLD CASE IN ABEYANCE**

Subject to the Court's approval and by and through their counsel of record,  
the parties stipulate as follows:

1. Plaintiffs filed this action under the Federal Tort Claims Act, 28 U.S.C. §§ 1346(b)(1), 2671, *et seq.*, and Alien Tort Statute, 28 U.S.C. § 1350, on February 1, 2021.
2. Defendant United States filed a Motion to Dismiss on April 26, 2021. Plaintiffs' time to respond to the motion is currently July 9, 2021.
3. The United States, along with a group of counsel who are coordinating negotiations on behalf of plaintiffs and claimants, are engaged in a nationwide effort to settle district court cases and pending administrative tort claims arising from family separations at the U.S./Mexico border that occurred during the prior

administration. While significant progress has been made, due to the scale and complexity of the effort, additional time is needed to achieve a global resolution of these matters.

4. Accordingly, the parties have agreed to and seek an order from the Court holding this action in abeyance for a period of sixty (60) days, through September 7, 2021, during which the settlement discussions will continue.

A proposed Order is submitted contemporaneously to the instant motion.

Dated: July 6, 2021

Respectfully submitted,

/s/ Veronica Finkelstein  
VERONICA J. FINKELSTEIN  
Assistant United States Attorney

*Counsel for the United States of  
America*

/s/ Karen L. Hoffmann  
Karen L. Hoffmann  
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532 Walnut Street  
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*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I, Karen Hoffmann, certify that on July 6, 2021, I served a copy of the Joint Stipulation and Proposed Order to Hold Case in Abeyance on all parties by CM/ECF.

Date: July 6, 2021

/s/ Karen L. Hoffmann

Karen L. Hoffmann

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